Table A – Administrative Controls
ITS Section 1.0 – Use and Application
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A1.0-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not revise or delete any technical requirements.	1.1	1.0
A1.0-01	Rewords CTS definitions of ACTIONS, CHANNEL CHECK, CORE ALTERATION, COLR, DOSE EQUIVALENT I-131, E-AVERAGE DISINTEGRATION ENERGY, OPERATIONAL MODE - MODE, OPERABLE - OPERABILITY, PTLR, QPTR, RTP, SDM, and STAGGERED TEST BASIS. These changes do not revise the meaning or intent of the current PI definitions.	1.1	1.0 ACTIONS, CHANNEL CHECK, CORE ALTERATION, COLR, DOSE EQUIVALENT I-131, E-AVERAGE DISINTEGRATION ENERGY, OPERATIONAL MODE - MODE, OPERABLE - OPERABILITY, PTLR, QPTR, RTP, SDM, and STAGGERED TEST BASIS
A1.0-04	Rewords CTS definition of CHANNEL CALIBRATION to specifically reference testing of resistance temperature detectors or thermocouple sensors, allowing in place qualitative assessment of sensor behavior, and normal calibration of the remaining devices in the channel. These changes do not substantively change the Prairie Island methodology for calibration of plant instrumentation.	1.1	1.0 CHANNEL CALIBRATION
A1.0-05	Updates CTS reference for COLR in accordance with NRC approved LAR.	1.1	1.0 COLR

Table A – Administrative Controls
ITS Section 1.0 – Use and Application
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A1.0-06	Rewords CTS wording and re-titles definition of CHANNEL FUNCTIONAL TEST to conform to CHANNEL OPERATIONAL TEST (COT). These changes do not substantively change the PI methodology for testing of these instruments.	1.1	1.0 CHANNEL FUNCTIONAL TEST
A1.0-08	Did not include CTS definition of LIMITING SAFETY SYSTEM SETTINGS. This is an Administrative change since the justification for not including LIMITING SAFETY SYSTEM SETTINGS is in the discussion of CTS.	NA	1.0 LSSS
A1.0-09	Rewords CTS definition of OPERABLE - OPERABILITY. Additional clarification was provided specifically allowing credit for both "normal or emergency power" instead of only stating normal power. These changes do not substantively change the definition of OPERABLE - OPERABILITY.	1.1	1.0 OPERABLE
A1.0-11	Rewords CTS definition of PHYSICS TESTS. The allowed power level for PHYSICS TESTS is now related to the definition of power level at which the MODE changes from MODE 2 to MODE 1.	1.1	1.0 PHYSICS TESTS
A1.0-12	Did not include CTS definition for PROTECTION INSTRUMENTATION AND LOGIC since it is not used in the ITS.	NA	1.0 PROTECTION INSTR & LOGIC
A1.0-18	Did not include CTS definition for SOURCE CHECK since it is addressed within the definition of CHANNEL CALIBRATION and CHANNEL OPERATIONAL TEST (COT).	NA	1.0 SOURCE CHECK
A1.0-19	Rewords CTS STAGGERED TEST BASIS by deleting the second paragraph which is consistent with rules and use of ISTS STAGGERED TEST BASIS. Any differences in use of this term between CTS and ITS are accounted for by changing instrument test Frequencies in Section 3.3.	1.1	1.0 STAGGERED TEST BASIS

Table A – Administrative Controls
ITS Section 1.0 – Use and Application
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A1.0-21	Did not include CTS definition for STARTUP OPERATION since the CTS and ITS are consistent and all phases of plant operation are included within the definition of MODES listed in Table 1.1-1.	NA	1.0 STARTUP
A1.0-24	Clarifies use of Logical Connectors to aid in the understanding and use of the new format, presentation style, and establish positions not previously formalized. These changes do not involve any substantive changes in plant operations or testing.	1.2	NA
A1.0-28	Adds a section explaining the use of the Frequencies specified within the SRs to aid in the understanding and use of the ITS format, presentation style, and establish positions not previously formalized. This explanation does not involve any substantive change in plant operations or testing.	1.4	NA
A1.0-29	Rewords CTS clarifying that SRs can be suspended when the plant is not in the Mode of Applicability associated with the SR. The intent of the CTS and NUREG/ITS requirements are the same and no plant operating or testing requirement changes have been introduced.	1.4	4.1.D

Table A – Administrative Changes
ITS Section 2.0 – Safety Limits
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A2.0-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not revise or delete any technical requirements.	LCO 2.0	LCO 2.0
A2.0-01	Minor format and wording changes have been made to CTS Section 2.1, 2.2.A, and 2.2.B. Which do not change the meaning, limits or otherwise change plant operation or testing.	LCO 2.1.1, 2.2.1, and 2.2.2	LCO 2.1, 2.1.B, 2.2, 2.2.A, and 2.2.B

Table A – Administrative Changes
Section 3.0 – LCO Applicability/SR Applicability
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.0-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not change or delete any technical requirements.	LCO 3.0	LCO 3.0 and 4.0
A3.0-01	Rewords and restates CTS phraseology for LCOs 3.0.A, 3.0.B, and 3.0.C. These changes include 1) using standard MODES of Operation such as MODE 1 and etc. instead of POWER OPERATIONS, 2) dividing LCO 3.0.A into two separated LCOs; and 3) listing those specific LCOs providing exemptions to the applicable LCO. The CTS requirements are basically the same in ITS 3.0 Specifications.	LCO 3.0.1, 3.0.2, and 3.0.3	LCO 3.0.A, 3.0.B, 3.0.C, 3.0.C.1, and 3.0.C.2
A3.0-02	Clarifies CTS requirements for Completion Times to state the total time from when the Condition was first entered and use the MODE number. CTS and ITS Completion Times are the same. Any differences are addressed in a separate Discussion of Change.	LCO 3.0.3	LCO 3.0.C.1 and 3.0.C.2
A3.0-04	Clarifies that ITS 3.0.3 only applies in MODES 1, 2, 3, and 4 which is consistent with the intent of CTS.	LCO 3.0.3	3.0.C
A3.0-09	Clarifies CTS relationship between Technical Specification and non-Technical Specification systems which support ITS.	LCO 3.0.8	NA
A3.0-12	Clarifies CTS intent for the application of test exception LCOs for the purpose of performing PHYSICS TESTING. This change does alter any plant operations or technical requirements.	LCO 3.0.7	NA
A3.0-13	Clarifies and formalizes the use of the PI ITS for two units.	LCO 3.0.9	NA
A3.0-17	Clarifies CTS requirements and limitations that the SRs shall be meet during the MODES or Other Specified Conditions in the Applicability for which the requirements of the LCO apply. This change does not impose any new requirements and is consistent with current practice at the PI plant.	LCO 3.0.1	LCO 4.0.B

Table A – Administrative Changes
Section 3.0 – LCO Applicability/SR Applicability
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.0-18	Rewords CTS requirements deferring entry into Required Actions. ITS wording allows delaying declaration that the LCO is not met rather than delaying only the ACTIONS. These changes are off-setting considerations and the intent remains the same.	LCO 3.0.3	LCO 4.0.B

Table A – Administrative Changes
ITS Section 3.1 – Reactivity Control Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.1-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not change or delete any technical requirements.	LCO 3.1.8	LCO 3.1.F, 3.10, SR 4.9, Table 4.1-2A and Table 4.1-1C
A3.1-01	Replaces CTS prose descriptions of Modes with equivalent ITS MODES of APPLICABILITY. The plant MODES to which this specification apply have not changed.	LCO 3.1.3, Conditions A and B, LCO 3.1.1, and 3.1.5	LCO 3.1.F.1, 3.1.F.3.a, 3.10.A.1, and 3.10.D.1
A3.1-02	Did not include meaningless CTS statement resulting from the new ITS format. No new limits are added to the ITS and the CTS limits are stated in the ITS.	NA	LCO 3.1.F.1 and 3.1.F.3.a
A3.1-06	Did not include meaningless CTS statements which are not contained in the ITS. This change does not affect any operating limits or conditions.	NA	LCO 3.1.F.3.a
A3.1-08	Did not include duplicative CTS NRC reporting requirements which are also outlined and submitted in accordance with 10CFR50.72 and 10CFR50.73.	NA	LCO 3.1.F.3.c
A3.1-12	Did not include general CTS Applicability and Objective statements. ITS administratively incorporates these statements within each specification, the plant design features, or systems to which it applies. These statements have been administratively incorporated, into the ITS, describing plant design features or systems since they do not establish any regulatory or operational requirements.	NA	LCO 3.10 and SR 4.9
A3.1-34	Restates CTS requirements for declaring a misaligned rod inoperable, however, both require verifying SDM, taking remedial action, and allowing the plant to continue to operate. This paragraph does not have any net change on plant operations under ITS requirements.	NA	LCO 3.10.E.2

Table A – Administrative Changes
ITS Section 3.1 – Reactivity Control Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.1-36	Clarifies CTS operating practices allowing for Separate Condition Entry for each inoperable rod position indicator and demand position indicator.	LCO 3.1.7	LCO 3.10.F
A3.1-48	Replaces the CTS requirement which declare a misaligned rod inoperable with the ITS requirement of declaring the rod as being misaligned. For either case, the plant would continue to operate, thus the change does not impact plant operations.	LCO 3.1.4, Condition A	LCO 3.10.G.5
A3.1-52	Rewords CTS requirements for when a rod is trippable but not movable, verifying that the rod position is within insertion limits to the ITS wording of verification that the rod alignment is within limits. This wording change does not change the impact on plant operations.	LCO 3.1.4, Condition A	LCO 3.10.G.6
A3.1-54	Rewords CTS Action Statement from one or more inoperable rods to one or more misaligned rods. This change does not affect plant operations or any technical requirements.	LCO 3.1.4, Condition D	LCO 3.10.G.5
A3.1-57	Rewords CTS terminology "loss of stationary gripper coil voltage" with "beginning of decay of stationary gripper coil voltage". This terminology does not change the SR performance and clarifies CTS intent.	SR 3.1.4.3	LCO 3.10.H

Table A – Administrative Changes
ITS Section 3.2 – Power Distribution Limits
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.2-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not change or delete any technical requirements.	LCO 3.2	LCO 3.10 and Table 3.5.2.A
A3.2-01	Did not include general CTS Applicability and Objective statements at the beginning of each CTS section. These statements only provided general information and do not impose any operational or technical requirements.	LCO 3.2	LCO 3.10
A3.2-03	Replaces CTS symbols for hot channel factors with symbols consistent with ISTS.	LCO 3.2.1 and 3.2.2	LCO 3.10.B.1, 3.10.B.2, 3.10.B.3(a), 3.10.B.3(b), 3.10.B.3(d)1, and 3.10.B.3(d)2
A3.2-05	Did not include CTS Unit 1, Cycle 19 specific requirements which are no longer applicable.	NA	LCO 3.10.B.1, 3.10.B.3(d), and 3.11
A3.2-06	Did not include CTS SR phrase "whichever occurs first" since all SRs are required to be performed regardless of which condition occurs first.	SR 3.2.1.2, 3.2.1.1, 3.2.2.1, and 3.2.2.2	LCO 3.10.B.2
A3.2-22	Clarifies CTS by adding a Note to reverify that Fwq is within limits which is consistent with the intent of the CTS.	SR 3.2.1.2	LCO 3.10.B.3.d
A3.2-23	Restates CTS descriptions of when the specification is applicable with a more precise applicability defined as MODE 1 with power > 15% RTP which consistent with the intent of CTS.	LCO 3.2.3	LCO 3.10.B.4

Table A – Administrative Changes
ITS Section 3.2 – Power Distribution Limits
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.2-26	Restates CTS requirement that the AFD is outside the target band when two or more operable excore channels indicate it is outside the target band for all power levels.	LCO 3.2.3	LCO 3.10.B.4, 3.10.B.5, and 3.10.B.6
A3.2-27	Rewords CTS Action Statement to more accurately define the ranges of applicability when there is a deviation between the AFD and Target Band. This change does not make any substantive changes in plant operation.	LCO 3.2.3	LCO 3.10.B.5 and 3.10.B.6
A3.2-33	Clarifies CTS Note allowing for extending the time the indicated AFD may deviate from the Target Band without penalty deviation time during the incore/excore calibration.	LCO 3.2.3	LCO 3.10.B.6(a)
A3.2-37	Clarifies CTS by using a more precise Applicability Statement which requires QPTR limits to be met in MODE 1 with the power > 50%.	LCO 3.2.4	LCO 3.10.C.1
A3.2-38	Did not incorporate CTS requirements to "correct" the QUADRANT POWER TILT RATIO (QPTR) if not within limits because restoring a limit is always an option.	NA	LCO 3.10.C.1a
A3.2-58	Clarifies CTS by adding a note stating that other means of determining QPTR can be one or more excore nuclear channel inputs inoperable.	SR 3.2.4.2	LCO 3.10.C.4

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.3-00	Editorial changes were made in reformatting, renumbering, and rewording in accordance with the guidance of NUREG-1431.	LCO 3.3	LCO 2.3, 3.5, 3.6, 3.7, 3.8, 3.10, 3.15, 4.1, Table 3.5-1, Table 3.5-2A, Table 3.5-2B, Table 3.15-1, Table 4.1-1A, Table 4.1-1B and Table 4.1-1C
A3.3-01	Did not include general CTS Applicability and Objective statements. ITS administratively incorporates these statements within each specification, the plant design features, or systems to which it applies. These statements have been administratively incorporated, in the ITS, describing plant design features or systems since they do not establish any regulatory or operational requirements.	LCO 3.3	2.3, 3.5, and 4.1
A3.3-02	Did not include a CTS reference to another section.	NA	LCO 2.3.A.3.d
A3.3-04	Reformats CTS Tables consistent with ISTS.	NA	LCO 3.5.A, 3.5.B, 3.15.B, SR 4.1.A, 4.1.B and 4.1.C
A3.3-05	Revises CTS column heading to "Required Channels" to be consistent with the ISTS.	Table 3.3.1-1 and 3.3.2-1	Table 3.5-2A and 3.5-2B

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.3-07	Replaces specific CTS references with ITS references.	Table 3.3.1-1, FU 1 thru 19, and 3.3.2-1, FU 1 thru 9	Tables 3.5-2A, Table 3.5-2B, and Table 3.15-1
A3.3-08	Deletes CTS general collective titles of the applicable modes. The applicable Modes are specifically defined in the Table and do not need to be described in the function title.	Table 3.3.1-1, FU 5	Table 3.5-2A Function 6 and Table 4.1-1A Function 6
A3.3-09	Clarifies CTS requirements for the time delay and time range for the degraded voltage DG start time delay.	SR 3.3.4.3	Table 3.5-1 Function 10
A3.3-14	Reformatted CTS including the RTBs have been included in a Table Function named Reactor Trip Breakers instead of their own separate Function.	Table 3.3.1-1, FU 17, and Note h	Table 3.5-2A Functions 19 and 20 Note (d) and Table 4.1-1A Functions 19 and 20, Notes 15 and 16
A3.3-18	Reformatted CTS Action Statements to be consistent with ISTS.	LCO 3.3.1, Cond B, C, D,E, F, H, J, K, L, M, N, O, and Note 1, LCO 3.3.2, Cond B, C, D, E, F, G, H, I, J, and K	Table 3.5-2A, Actions 1, 4, 5, 6, 7, 8, 11, and 33 and Table 3.5-2B Actions A, 20, 21, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32,

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
		LCO 3.3.4, Cond A, B, and C	and 33
A3.3-19	Revises CTS title for reactor trip system consistent with ISTS by deleting "and Interlock".	Table 3.3.1-1, FU 19	Table 3.5-2A Function 18 and Table 4.1-1A Function 18
A3.3-21	Replaces CTS Action Statements Mode Titles with equivalent Mode numbers. In addition, the Completion Times have been reformatted to require actions in total hours instead of specific increments. The overall times have not changed.	LCO 3.3.1, Cond B, M, O, and P and LCO 3.3.2, Cond B, C, F, and G	Table 3.5-2A, Action 1, 7, 9, and 10, and Table 3.5-2B, Action 20, 23, 25, 27, and 28
A3.3-23	Did not include CTS statement that the IRNIs channel be restored to OPERABLE prior to increasing power above P-6. This requirement is included in ITS LCO 3.0.4 which provides the same restriction.	LCO 3.0.4 and LCO 3.3.1 Cond F	Table 3.5-2A Action 3
A3.3-28	Replaces specific CTS terminology "unblocked" with "blocked" when describing the reactor trip interlocks.	Table 3.3.1-1, FU 16, 16.b.2, 16.d, and 16.e.	LCO 2.3.B.1, 2.3.B.2, 2.3.B.4, and 2.3.B.5
A3.3-29	Reformats CTS presentation of shutdown tracks consistent with ISTS format.	LCO 3.3.1 Cond B, M, N, O, and P, LCO 3.3.2, Cond B, C, F, and G	Table 3.5-2A Actions 1, 7, 8, 9, and 10 and Table 3.5-2B Actions 20, 23, 25, and 28

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.3-34	Reformatted CTS requirements for inoperable RTBB to be OPERABLE prior to placing in service consistent with ISTS.	SR 3.3.1.4 Note 1	Table 3.5-2A Action 10
A3.3-35	Revises CTS title, "Automatic Actuation Relay Logic" to more accurately reflect PI design.	Table 3.3.2-1, FU 2, 2b, 3b, 4b, and 5b Table 3.3.5-1	Table 3.5-2B Functions 1e, 2c, 3.e, 4.f, 5e, 6d, and 7f Table 4.1-1B FU 1e, 2c, 3c, 4f, 5e, 6d, and 7f.
A3.3-38	Reformats CTS Note to be consistent with ISTS meaning that the function is not required below 2000 psig in the RCS.	Table 3.3.2-1, Note a	Table 3.5-2B note a and Table 4.1-1B Note 21
A3.3-39	Reformats CTS Note consistent with ISTS requiring the function of CVI OPERABLE during containment integrity and movement of irradiated fuel.	Table 3.3.5-1, Notes a, b, and Applicability	Table 3.5-2B Note b and Table 4.1-1B Note 26
A3.3-43	Reformats CTS Note restating the Applicability for when both MSIVs are closed.	Table 3.3.2-1 Note c	Table 3.5-2B note c and Table 4.1-1B Note 23 .
A3.3-47	Revises CTS Function Title deleting "4.16 kV" since it is redundant information.	Table 3.3.2-1, FU 6	Table 3.5-2B Function 7

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.3-48	Clarifies CTS with wording consistent with ISTS.	Table 3.3.2-1, Note G	Table 3.5-2B Footnote and Table 4.1-1B
A3.3-50	Revised CTS consistent with LAR entitled, "Removal of Boric Acid Storage Tanks from the Safety Injection System."	NA	Table 3.5-2B Function 9 Action 34, 35, and 36
A3.3-51	Reformats CTS requirements from being subdivided into the turbine driven AFW and the motor driven AFW.	Table 3.3.2-1, FU 6e	Table 3.5-2B and Table 4.1-1B Function 7d
A3.3-54	Restates CTS required actions for systems normally blind flanged and not operating.	LCO 3.3.5, Cond B and C	Table 3 5-2B, Action 22
A3.3-55	Did not include CTS statement allowing one channel to be bypassed for up to 8 hours for surveillance testing since this is included with the AFW logic testing.	LCO 3.3.1, Condition I	Table 3.5-2B, Action 30
A3.3-62	Did not include CTS specific Objective statements which did not provide any technical requirements.	LCO 3.3.3	LCO 3.15
A3.3-63	Restates CTS requirements allowing the plant to start up with inoperable EM equipment.	LCO 3.3.3, Actions	LCO 3.15.C
A3.3-65	Restates CTS using ISTS descriptive terminology "Penetration Flow Path."	Table 3.3.3-1, FU 9	Table 3.15-1 Function 9

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.3-66	Did not include unnecessary CTS descriptive verbiage.	Table 3.3.1-1, FU 15 and Table 3.3.3, Note c	Table 3.15.1 Action 5, 15, and 16 Note c
A3.3-68	Clarifies CTS adding a Note in the EM Table that each core exit thermocouple is a channel.	Table 3.3.1-1 Note c	NA
A3.3-69	Clarifies CTS by providing a direction for operators to follow if they do not comply with specific Completion Times.	LCO 3.3.3, Cond H	NA
A3.3-72	Did not include CTS column title of Functional Test since this test has been replaced by other tests i.e., TADOT, COT, or ALT.	Table 3.3.1-1, FU 1 thru 19	Table 4.1-1A, FU 1 thru 20 and 4.1-1B, and 4.1-1C
A3.3-75	Restate CTS requirements for SRs for the calibration of the Power Range Neutron Flux High Setpoint.	Table 3.3.1-1, FU 6, 7, and 20	Table 4.1-1A Functions 2a, 7, and 8.
A3.3-81	Clarifies CTS requirements that setpoint verification is not required for the quarterly SR of the 4 kV RCP Bus undervoltage and underfrequency.	Table 3.3.1-1, FU 11 and 12	Table 4.1-1A Functions 15 and 16b
A3.3-84	Clarifies CTS requirements for response time testing of the automatic trip logic and reactor trip breakers.	Table 3.3.1-1, FU 17 and 19	Table 4.1-1A Functions 18 and 19
A3.3-85	Did not include CTS format for Frequency notations not included in the ISTS.	LCO 3.3	Table 4.1-1A, Table 4.1-1B and Table 4.1-1C

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.3-94	Did not include unnecessary CTS descriptive wording.	SR 3.3.1.11, Note	Table 4.1-1A Note 7
A3.3-95	Restates CTS requirements for STAGGERED TEST BASIS consistent with ISTS.	SR 3.3.1.4, 3.3.1.5, and 3.3.2.2	Table 4.1-1A Note 9 and Table 4.1-1B Note 22
A3.3-107	Did not include CTS Note referencing a specific Specification since it is no longer applicable.	NA	Table 4.1-1B Note 25
A3.3-109	Clarifies CTS by adding a Note requiring verification of the setpoint is not required by this SR.	SR 3.3.2.4, Note	NA
A3.3-114	Incorporated LAR, "Removal of Boric Acid" into the CTS.	NA	Table 4.1-1C Functions 5, 7, 9 and 12 and Note 33
A3.3-123	Did not include CTS Notes due to ISTS format.	NA	Table 4.1-1C Notes 35, 36, and 37
A3.3-126	Restates CTS references for TS 3.11 to ITS 3.2.4.2.	LCO 3.3.1, Cond D	LCO 3.10.C.4
A3.3-128	Replaces CTS designation of channel for SI input, trip, and RTBs with train designation.	Table 3.3.1-1, FU 15, 17, and 19	Table 3.5-2A Function 17, 18 and 19

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.3-130	Revises the CTS definition of the nomenclature and the values for f(ΔI) consistent with ISTS.	Table 3.3.1-1, FU 6, Note 1	LCO 2.3.A.2.d and 2.3.A.2.e
A3.3-133	Restates CTS requirements that undervoltage is a percentage of normal voltage to undervoltage is a percentage of rated bus voltage.	Table 3.3.1-1, FU 11a and 11b	LCO 2.3.A.2.g
A3.3-134	Clarifies CTS instrumentation ranges for measuring high pressurizer water level and low low steam generator water level which are specified as a percentage of narrow range.	Table 3.3.1-1, FU 9 and 13	LCO 2.3.A.3.a and 2.3.A.3.b
A3.3-141	Restates CTS SR that a COT be performed on intermediate range and source range neutron instrumentation prior to reactor startup following each shutdown in excess of 2 days. The ITS requires the same SR Frequency only specified as 48 hours instead of a 2 days.	SR 3.3.1.8	Table 4.1-1A Notation 4
A3.3-142	Clarifies CTS applicability by specifically stating that once the plant is in Mode 3, the MSIVs can be shut thus exiting the Mode of Applicability which is consistent with ISTS.	LCO 3.3.2, Condition G	Table 3.5-2B Action 25
A3.3-143	Clarifies CTS requirements that the neutron detectors are excluded from CHANNEL CALIBRATION. This is consistent with current PI practices and ISTS requirements.	SR 3.3.3.1, 3.3.3.2, and LCO 3.3.5	Table 4.1-1C Footnote 41 and FU 23
A3.3-144	Restates CTS requirements for submitting a report to the NRC.	5.6.8, LCO 3.3.3, Cond C and J	Table 3.15 Action (a)1 and 3
A3.3-146	Clarifies CTS requirements ensuring that with one or more trains of radiation monitoring inoperable, operation may continue provided that the containment inservice purge supply and exhaust valves are closed.	LCO 3.3.5, Cond A and B	Table 3.5-2B, Action 22
A3.3-147	Reformats CTS requirements for CVI instrumentation.	LCO 3.3.5	LCO 3.6.D.2.c

Table A – Administrative Changes
ITS Section 3.3 – Instrumentation
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.3-148	Restates CTS actions requiring that with one or more inservice purge Functions inoperable, enter applicable Conditions and Required Actions of LCO 3.6.3 for containment inservice purge valves made inoperable by isolation instrumentation.	LCO 3.3.5, Condition B	LCO 3.6.D.2.d
A3.3-149	Reformatted CTS consistent with ISTS wording.	LCO 3.3.5 and Applicability	LCO 3.8.A.1.j
A3.3-150	Clarifies CTS requirements by adding a Note stating that separate condition entry is allowed for each Function. This is consistent with PI current intent.	LCO 3.3.4, Condition A	Table 3.5-2B, Function 8.
A3.3-151	Clarifies CTS intent that if the automatic load sequencers are inoperable, specific actions are required to be taken.	LCO 3.3.4	Table 3.5-2B, Function 8
A3.3-155	Clarifies CTS requirements that the neutron detectors are excluded from response time testing.	Table 3.3.1-1, FU 2a, 2b, 3a, 3b, 5, 6, and 7 SR 3.3.1.16, Note	Table 4.1-1A Functions 2a, 2b, 3a, 5, 6, and 7
A3.4-158	Eliminates CTS requirements allowing two channels of power range instrumentation to be taken out of service since the ISTS incorporates this allowance generically.	LCO 3.1.8	Table 3.5-2A, Action 2d

Table A – Administrative Changes
ITS Section 3.4- Reactor Coolant System
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.4-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not change or delete any technical requirements.	LCO 3.4	LCO 3.1, 3.3, 3.10, Table 4.1-2A, Table 4.1-2B, Table 4.1-1C, 4.3 and 4.6
A3.4-03	Removes general CTS Applicability and Objective statements at the beginning of each CTS section. These statements only provide general information and do not impose any operational or technical requirements.	LCO 3.4	LCO 3.1 and 4.3
A3.4-08	Replaces CTS prose descriptions of Modes with equivalent ITS MODES of APPLICABILITY. The plant Modes to which this specification apply have not changed.	LCO 3.4	LCO 3.1.A.1.a(2), 3.1.A.1.b(1), 3.1.A.1.b (2), 3.1.A.1.c(1), 3.1.A.1.c(3), 3.1.A.1.d, 3.1.A.2.a(1), 3.1.A.2.a(2), 3.1.A.2.a(3), 3.1.A.2.b(1), 3.1.A.2.c(1), 3.1.A.2.c(1)(a), 3.1.A.2.c(1)(b), 3.1.A.2.c(1)(b)3, 3.1.B.1.b, 3.1.C.1, 3.1.C.2, 3.1.C.2.d, 3.1.C.3, 3.1.D.2, 3.1.D.2.a, 3.1.D.2.b, 3.10.J and 4.3.

Table A – Administrative Changes
ITS Section 3.4- Reactor Coolant System
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.4-14	Did not include CTS statement that "STARTUP OPERATION which is duplicative to ITS general rules for use and applicability governing how the plant may operate. Among these rules is Specification 3.0.4 which, unless specifically excepted, does not allow the plant to startup with inoperable TS required equipment.	NA	LCO 3.1.A.1.b(2), 3.1.A.2.a(2), 3.1.A.2.b(1) and 3.1.A.2.c(1)(b)
A3.4-18	Did not include CTS actions which are defined by the format of ITS.	NA	LCO 3.1.A.1.b(3)
A3.4-22	Did not include CTS requirements for the plant to shut down which are provided by ITS format.	NA	LCO 3.1.A.1.b(3)
A3.4-28	Divides CTS Specification requiring two methods of cooling the RCS to be operable with one in operation when in MODE 4 and MODE 5, loops filled into two separate Specifications.	LCO 3.4.7	LCO 3.1.A.1.c
A3.4-39	Revises CTS format to be consistent with the ITS. The format for CTS and ITS fundamentally differ in the presentation of shutdown tracks but the Completion Time requirements are the same.	LCO 3.4.3, LCO 3.4.9, Conditions A, B, and C, LCO 3.4.11, Conditions D, E, and G, LCO 3.4.14, Conditions B, C, and D, and LCO 3.4.15	LCO 3.1.A.2.a(2). 3.1.A.2.a(3), 3.1.A.2.c.(1,(b)(1), 3.1.A.2.c.(1)(b)(3), 3.1.B.1.b and 3.1.C.2
A3.4-46	Incorporates CTS allowance for pressurizer safety valves to be 2485 psig ± 3% when tested for operability.	LCO 3.4.10	LCO 3.1.A.2.b (1)

Table A – Administrative Changes
ITS Section 3.4- Reactor Coolant System
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.4-49	Did not include CTS required action since it is included based on ITS format.	NA	LCO 3.1.A.2.c (1)(b)(1), 3.1.A.2.c(1)(b)(3), 3.1.A.2.c(1)(b)(4), and 3.1.A.2.c(1)(b)(5)
A3.4-61	Revises CTS requirements for maintaining RCS pressure and temperature limits by dividing them into two sets of action statements. This change also includes changing to the NUREG-1431 use of MODES to define plant conditions rather than use of prose descriptions. These are editorial and format changes and do not change PI operating practices or intent.	LCO 3.4.3	LCO 3.1.B.1.b
A3.4-71	Clarifies CTS requirements to immediately enter into LCO 3.0.3, which is the appropriate action if no leakage detection instrumentation is OPERABLE. This is consistent with current PI practices.	LCO 3.4.16	LCO 3.1.C.1 and 3.1.C.2.d
A3.4-73	Clarifies CTS LEAKAGE requirements making it consistent with the ITS definition of LEAKAGE. This change is consistent with PI current operating practices.	LCO 3.4.14, Conditions A and C	LCO 3.1.C.2.a
A3.4-77	Did not include CTS requirements since it is included in the ITS format.	NA	LCO 3.1.C.2.d
A3.4-78	Revises CTS requirements for inservice steam generator tube inspection to include in ITS Section 5.5. No technical changes are associated with this change.	3.4.14, Condition D and SR 3.4.14.2	LCO 3.1.C.2.e and SR 4.12
A3.4-83	Clarifies CTS Applicability to be consistent with the ITS format.	LCO 3.4.12 and 3.4.13	LCO 3.3.A.3 and 3.3.A.4

Table A – Administrative Changes
ITS Section 3.4- Reactor Coolant System
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.4-99	Revises CTS SR Frequency general statement from prior to resuming power after each refueling to every 24 months.	SR 3.4.15.1	SR 4.3
A3.4-100	Clarifies CTS requirements for RCS total flow rate. Only editorial changes were made and no parameter, technical or operational changes made.	SR 3.4.1.4	LCO 3.10.J
A3.4-102	Replaces CTS statement, "whenever the reactor coolant system average temperature is below 350 F" with the ITS equivalency of MODE 4. The temperature limit of 350 F in the CTS is the same as ITS Mode 4.	LCO 3.4.6	LCO 3.1.A.1.c (1)
A3.4-103	Replaces CTS statement, "whenever the reactor coolant system average temperature is below 350 F" with the ITS equivalency of MODE 5 with RCS loops filled. The temperature limit of below 350 F in the CTS is enveloped in the ITS Mode 5 with RCS loops filled.	LCO 3.4.11	LCO 3.1.A.1.c (1)
A3.4-104	Editorially revises CTS action statement for only one OPERABLE method of removing decay heat. The actions are the same in both CTS and ITS .	LCO 3.4.12 and 3.4.13	LCO 3.1.A.1.c (2)
A3.4-105	Editorially revises CTS shutdown requirements with one method of decay heat removal inoperable. The Actions and Completion Times in both the CTS and ITS are the same, no technical or operational changes have been made to this requirement.	LCO 3.4.12 and 3.4.13	LCO 3.1.A.1.c (2)
A3.4-106	Editorially revises CTS requirement with no methods of removing decay heat. CTS and ITS actions and Completion Times remain the same.	LCO 3.4.13	LCO 3.1.A.1.c (3)
A3.4-107	Editorially revises CTS requirements for defining the acceptable methods for removing decay heat. CTS and ITS allow the use of the same decay heat removal system or a combination of the two to meet the LCO requirements.	LCO 3.4.11	LCO 3.1.A.1.c (1)

Table A – Administrative Changes
ITS Section 3.4- Reactor Coolant System
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.4-110	Clarifies intent of CTS requirements by adding a note stating that the Required Actions do not have to be entered if sole reason for the block valves being declared inoperable is a result of power being removed to comply with other Required Actions. No operational or technical changes are associated with this change.	LCO 3.4.11	LCO 3.1.A.2.c (1) and 3.1.A.2.c(1)(b)(4)
A3.4-111	Clarifies intent of CTS requirements by adding a Note that with both block valves inoperable, restore one block valve to OPERABLE status within 2 hours, if sole reason for the block valves being declared inoperable is a result of power being removed to comply with other Required Actions. No operational or technical changes are associated with this change.	LCO 3.4.11	LCO 3.1.A.2.c (1)(b)(5)
A3.4-112	Clarifies CTS requirements that the Primary System Leakage be evaluated daily, but not required to be performed until 12 hours after establishment of steady state operation. Performance of this SR at steady state conditions is standard PI operating practice and consistent with the intent of the CTS.	SR3.4.14.1	Table 4.1-2A Item 9
A3.4-113	Clarifies CTS requirements by adding a Note stating that the SR is to be performed in MODES 1 and 2 for the Pressurizer PORV Block. Performance of this SR in MODE 3 is standard PI operating practice and consistent with the intent of the CTS.	SR 3.4.11.1	Table 4.1-2A Item 6
A3.4-114	Clarifies CTS requirements by adding a Note stating that the SR is to be performed in MODES 1 and 2 to functionally test the PORVs. Performance of this SR in MODE 3 is standard PI operating practice and consistent with the intent of the CTS.	SR 3.4.11.2	Table 4.1-2A Item 7
A3.4-120	Editorially revises CTS requirements that two methods of decay heat removal be OPERABLE when the reactor is in MODE 5. With only one OPERABLE method of removing decay heat, initiate prompt action to restore two OPERABLE methods of removing decay heat. The ITS requires two loops of decay heat removal be OPERABLE when the reactor is in MODE 5. With one required loop inoperable and one RHR loop OPERABLE, immediately initiate action to restore a second loop to OPERABLE status. Since the only changes were editorial, the Required Actions and associated Completion Times are the same and no technical changes or operating practices were changed.	LCO 3.4.11 and 3.4.12	LCO 3.1.A.1.c (2)

Table A – Administrative Changes
ITS Section 3.4- Reactor Coolant System
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.4-121	Editorially revises CTS requirements for two methods of decay heat removal be OPERABLE when the reactor is in MODE 5. These changes were editorial; the Required Actions and associated Completion Times are the same and no technical changes or operating practices were changed.	LCO 3.4.11 and 3.4.12	LCO 3.1.A.1.c (2)
A3.4-122	Editorially revises CTS Required Actions with no methods of removing decay heat. These changes were editorial; the Required Actions and associated Completion Times are the same and no technical changes or operating practices were changed.	LCO 3.4.13	LCO 3.1.A.1.c (3)
A3.4-124	Editorially revises CTS requirement by combining the SR and Footnote and replacing power operation with MODE 1.	SR 3.4.17.3	Table 4.1-2B Item 3
A3.4-125	Editorially revises CTS requirement for performing this SR at reactor power with MODE 1.	SR 3.4.17.2	Table 4.1-2B Item 2
A3.4-127	Did not include CTS requirements that reactor vessel head be removed. This flexibility exits the specification Applicability as defined in ITS.	NA	LCO 3.3.A.3(b)
A3.4-132	Eliminated CTS wording allowing returning PIV to service to perform testing. This is included in ITS LCO 3.0.5	LCO 3.0.5	SR 4.3

Table A – Administrative Changes
ITS Section 3.5 – Emergency Core Cooling Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.5-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not change or delete any technical requirements.	LCO 3.5.2	LCO 3.3, Table 4.1-2B, and 4.5
A3.5-01	Revises specific CTS details of RWST OPERABILITY requirements for volume and boron concentration to an SR.	LCO 3.5.4	LCO 3.3.A.1.a
A3.5-04	Revises CTS details for the ECCS Accumulators OPERABILITY requirements for volume, boron concentration, nitrogen cover pressure, and verification that the isolation valves are open to the SRs.	LCO 3.5.1	LCO 3.3.A.1.b
A3.5-07	Replaces CTS Applicability Statement to exclude MODE 4.	LCO 3.5.2	LCO 3.3.A.1.c
A3.5-15	Replaces CTS Action Statement for Accumulator inoperability to exclude boron concentration events.	LCO 3.5.1	LCO 3.3.A.2.e
A3.5-17	Clarifies CTS requirements for entering a shutdown track is one ECCS train is inoperable and the other train cannot supply 100% flow.		
A3.5-20	Incorporates NRC approved LAR entitled, "Removal of Boric Acid Storage Tanks from the Safety Injection System," submitted April 17, 2000.	SR 3.5.4.2	LCO 3.3.A.1.a, Table 4.1-2B, 4.5.B.3.a, and 4.5.B.3.c
A3.5-22	Did not include CTS reference to the IST Program using a Specification number with the actual title of IST.	NA	SR 4.5.B.1.a

Table A – Administrative Changes
ITS Section 3.5 – Emergency Core Cooling Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.5-301	Removes general CTS Applicability and Objective statements at the beginning of each CTS section. These statements only provided general information and do not impose any operational or technical requirements.	LCO 3.5	LCO 3.3 and SR 4.5
A3.5-302	Revises CTS Specification titles for Safety Injection and Residual Heat Removal System, and ECCS Safety Injection System to ECCS.	LCO 3.5 and SR 3.5.2.5	LCO 3.3.A, SR 4.5.B.1.a, and 4.5.B.3.f
A3.5-303	Replaces CTS prose descriptions of Modes with equivalent ITS MODES of APPLICABILITY.	LCO 3.5.2	LCO 3.3.A.1 and 3.3.A.2
A3.5-304	Replaces CTS OPERABILITY range for accumulator volume and nitrogen cover pressure expressed in terms of a median value plus or minus the allowable variation by the equivalent simple range over which the parameters are acceptable.	SR 3.5.1.2	LCO 3.3.A.1.b(3)
A3.5-306	Clarifies CTS requirements, "any one of the following conditions of inoperability may exist . . ." This requirement prevents two or more of the listed conditions from existing at the same time. In the ITS, these conditions may be in more than one specification. The SFDP provides a mechanism to assure that entry into multiple TS Conditions will not result in loss of safety function.	SR 3.5.2	LCO 3.3.A.2
A3.5-307	Incorporates NRC approved LAR titled, "Increase ECCS Accumulator Allowed Outage Time to 24 hours."	LCO 3.5.1	LCO 3.3.A.2.e
A3.5-309	Clarifies CTS Actions to be taken if both accumulators were inoperable. ITS specifically has a Condition requiring entry into LCO 3.0.3. The CTS would require entry into LCO 3.0.C since there would not be a specific Action Statement for both accumulators being inoperable.	SR 3.5.1.1	LCO 3.3.A.1.b.(1)
A3.5-316	Incorporates both PI specific valve numbers with their associated Westinghouse valve numbers. Both numbers are utilized in the control room.	SR 3.5.2.1	LCO 3.3.A.1.g (1) and (2)

Table A – Administrative Changes
ITS Section 3.6 – Containment Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.6-00	Editorial changes were made in reformatting, renumbering, and rewording in accordance with the guidance of NUREG-1431. These changes do not change or delete any technical requirements.	LCO 3.6	LCO 1.0, 3.3.B, Table TS.3.5-1, 3.6, Table TS.4.1-1C, Table TS.4.1-2B, SR 4.4, and 4.5
A3.6-03	Replaces general CTS prose descriptions with equivalent ITS MODES of APPLICABILITY. The plant Modes to which this specification apply have not been changed.	LCO 3.6	LCO 3.3.B.1, 3.3.B.2, 3.6.A.1, 3.6.A.2, 3.6.B.1, 3.6.C.2, 3.6.D.2, 3.6.G, 3.6.H.1, 3.6.I.1, 3.6.I.2, 3.6.J.1, 3.6.J.2, 3.6.K.1, 3.6.K.2, 3.6.L.1, 3.6.M.1, 3.6.M.2.c, 3.6.M.3, and Table 4.1-1C Note 39, SR 4.4.G and 4.4.H.

Table A -- Administrative Changes
ITS Section 3.6 – Containment Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.6-05	Revise CTS CONTAIMENT INTEGRITY Definition Items 1, 3 and 4 to include in various ITS Specifications and SRs.	LCO 3.6.1, 3.6.2, and 3.6.3	1.0 CONTAIMENT INTEGRITY
A3.6-09	Did not include general CTS Applicability and Objective statements at the beginning of each CTS section. These statements only provide general information and do not impose any operational or technical requirements.	NA	LCO 3.6,SR 4.4, and 4.5
A3.6-11	Revises CTS wording for defined times for Required Actions. The ITS defines all action times from the time the first initiated action occurs. Thus the ITS is equivalent to the CTS Required Action time.	LCO 3.6	LCO 3.3.B.2, 3.6.A.2, 3.6.G, 3.6.I.2, 3.6.J.2, 3.6.K.2, 3.6.M.2.c and 3.6.M.3
A3.6-19	Clarification of the CTS is provided for guidance for multiple valves in multiple penetrations is provided in an equivalent Note allowing separate Condition entry for each containment flow path.	LCO 3.6.3, Note 2	LCO 3.6.C.1
A3.6-22	Clarifies intent of CTS for inoperable or leaking barriers. These provisions are the same as PI current practice therefore these changes are administrative.	LCO 3.6.3, Notes 3 and 4	LCO 3.6.C.1
A3.6-23	Clarifies CTS by adding a Note to apply the requirements to those penetrations which do not use a closed system as a barrier.	LCO 3.6.3, Condition A	LCO 3.6.C.3
A3.6-24	Clarifies CTS by including the clause, "penetration flow paths with one" to those penetration flow paths with a single inoperable barrier. The Condition for a penetration flow path with two inoperable barriers is addressed separately.	LCO 3.6.3, Condition C	LCO 3.6.C.3
A3.6-26	Clarifies CTS wording which allows a valve to be deactivated when a containment isolation valve is inoperable.	LCO 3.6.3	LCO 3.6.C.3.(b)

Table A – Administrative Changes
ITS Section 3.6 – Containment Systems

(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.6-42	Clarifies CTS stating that entry into LCO 3.6.1 is required if airlock leakage exceeds the Containment Leakage Rate Test Program acceptance criteria. This is the same action the plant would take under the CTS.	LCO 3.6.2	LCO 3.6.M
A3.6-48	Clarifies CTS by providing two Notes. These changes are editorial and are consistent with PI operating practices and technical requirements.	SR 3.6.2.1	SR 4.4.A.2 and 4.5.A.2.a
A3.6-49	Clarifies intent of CTS actions for two inoperable doors in an air lock if both doors in the same air lock are inoperable.	LCO 3.6.2, Conditions A and B	LCO 3.6.M.1
A3.6-54	Clarifies CTS SR Frequency for a functional test of the containment vacuum breakers to be provided quarterly consistent with current PI procedures.	SR 3.6.8.1	Table 4.1-1C Function 10
A3.6-62	Restates CTS requirements for the inservice purge penetration leakage.	LCO 3.6.8	LCO 3.6.B.3
A3.6-77	Clarifies CTS requirements by entering a reactor shutdown track per LCO 3.0.C.	LCO 3.6.3, Conditions D, and E	LCO 3.6.D.2.e
A3.6-80	Clarifies CTS requirements for testing of containment spray and spray additive valves. These changes do not change the type or number of valves which are tested under CTS.	SR 3.6.6.4	SR 4.5.B.3.f

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.7-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not change or delete any technical requirements.	Section 3.7	LCO 3.3.C, Table TS.3.5-2B, 3.4, 3.6.D, 3.7, 3.7.A.5(a), 3.8.B, 3.13, Table TS.4.1-2A, Table TS.4.1-2B, SR 4.4.B, 4.5, 4.7, 4.8, 4.14, 4.15, and 4.20
A3.7-01	Removes general CTS Applicability and Objective statements at the beginning of each CTS section. These statements only provided general information and do not impose any operational or technical requirements.	NA	LCO 3.4, 3.13, SRs 4.7, 4.8, 4.14, 4.15 and 4.20
A3.7-02	Replaces CTS prose descriptions of MODES with equivalent ITS MODES of APPLICABILITY. The plant MODES to which this specification apply have not changed.	LCO 3.7.1, 3.7.4, 3.7.5, 3.7.7, and 3.7.12	LCO 3.4.A, 3.4.B, 3.4 D.1, 3.3.C.1.a, 3.3.D, 3.6.E and 3.6.F
A3.7-04	Replaces CTS prose descriptions of MODES with equivalent ITS MODES of APPLICABILITY. The plant MODES to which this specification apply have not changed.	LCO 3.7.1 Cond B, 3.7.4 Cond C, 3.7.5 Cond C, 3.7.6 Cond B, 3.7.7 Cond B, 3.7.8 Cond D, 3.7.9 Cond D, and 3.7.10 Cond A and C	LCO 3.4.A.2, 3.4.B.2, 3.3.C.1.b, 3.3.D.2 and 3.13.A.2

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.7-05	Replaces CTS prose descriptions of MODES with equivalent ITS MODES of APPLICABILITY. The plant MODES to which the listed specifications apply have not changed.	LCO 3.7.1 Cond B, 3.7.4 Cond C, 3.7.5 Cond C, 3.7.6 Cond B, 3.7.7 Cond B, 3.7.8 Cond D, 3.7.9 Cond D, 3.7.10 Cond A, C, F, 3.7.12 Cond B and C, and 3.7.14 Cond A	LCO 3.4.A.2, 3.4.B.2, 3.4.D, 3.3.C.1.b, 3.3.D.2, 3.13.A.2 and 3.6.E.1.
A3.7-06	Clarifies CTS defined times for required actions from the time a new action is initiated. The ITS defines all action times from the time the first initiated action occurs. Thus, the ITS is equivalent to the CTS required action time.	LCO 3.7.1 Cond B, 3.7.4 Cond C, 3.7.5 Cond C, 3.7.6 Cond B, 3.7.7 Cond B, 3.7.8 Cond D, 3.7.9 Cond D, 3.7.10 Cond F, and 3.7.12 Cond B and C	LCO 3.4.A.2, 3.4.B.2,, 3.3.C.1.b, 3.3.D.2, 3.13.A.2 and 3.6.E.1.
A3.7-09	Includes AFW requirements for two units operating in the ITS LCO such that the requirements are the same for each operating unit. Therefore, a separate statement for two unit operation is not required. This change is consistent with the intent of the CTS.	LCO 3.7.5	LCO 3.4.B.1.b
A3.7-20	Divides CTS requirements contained in one specification into separate specifications in the ITS. This is consistent with PI operational practices.	LCO 3.7.6 Cond B	LCO 3.4.B.2
A3.7-21	Clarifies CTS requirements for completion of turbine driven AFW pump testing. This is consistent with current PI operating practices.	LCO 3.7.5.2 Note	LCO 3.4.B.2.a

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.7-36	Did not include CTS specifications requiring restrictions on single unit or two unit operations. This is included in the intent of the ITS and does not change any operational practices.	LCO 3.7.7	LCO 3.3.C.1
A3.7-44	Restates CTS requirements for safeguards CL pump inoperability to state "No safeguards pumps OPERABLE for one train . . ." This statement is substantively the same as the CTS requirements with no change in operational practices.	LCO 3.7.8 Cond B	LCO 3.3.D.2.a
A3.7-45	Replaces explicit specific system wording of CTS action requirements with the general ITS requirement LCO 3.0.6 and programmatic ITS requirement 5.5.13, with no technical changes.	LCO 3.7.8 Cond B, 3.0.6, and 5.5.13	LCO 3.3.D.2.a.(1) and (2)
A3.7-47	Replaces explicit specific system wording of CTS action requirements with the general ITS requirement LCO 3.0.6 and programmatic ITS requirement 5.5.13, with no technical changes.	LCO 3.7.8 Cond C, 3.0.6, and 5.5.13	LCO 3.3.D.2.b(1) and (2)
A3.7-57	Clarifies CTS action statements for CRSVS during plant operation (MODES 1, 2, 3, and 4) and irradiated fuel handling operations. This is consistent with PI operating practices.	LCO 3.7.10 Cond D and E	LCO 3.13.A.1 and 3.13.A.2
A3.7-62	Restates CTS requirements for Auxiliary Building Special Ventilation Zone Integrity in ITS 3.7.12 requirements for the ABSVS; thus the title of this section is also revised.	LCO 3.7.12 Cond B and C	LCO 3.6.E.1
A3.7-66	Rewords applicability for fuel handling operations specification, 3.8.B.1.c, by combining this specification with the spent fuel pool boron concentration specification, 3.8.E.2.a, which expands the applicability beyond involving a spent fuel cask containing fuel to state the boron concentration is to be maintained at 1800 ppm at all times when spent fuel is stored in the spent fuel pool, consistent with CTS 3.8.E.2.a.	LCO 3.7.16 APPLICABILITY	LCO 3.8.B.1.C and 3.8.E.2.a
A3.7-74	Restates Reference to CTS LCO 3.0.C which is equivalent to ITS LCO 3.0.3, as a Reference to LCO 3.0.3.	LCO 3.7.13 Action Notes, 3.7.16 Cond A, and 3.7.17 Cond A	LCO 3.8.D.4 and 3.8.E.1
A3.7-77	Restates CTS title of this specification to be consistent with the title of ITS 3.7.17.	LCO 3.7.17	LCO 3.8.E.1

Table A – Administrative Changes
ITS Section 3.7 – Plant Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.7-78	Restates CTS title and terminology within this specification to be consistent with the title and terminology in ITS 3.7.16. No technical or operational changes have been made as a result of this change.	LCO 3.7.16 and SR 3.7.16.2	LCO 3.8.E.2 and Table 4.1-2B Function 13
A3.7-83	Restates CTS requirements for testing MSIV closure time upon receipt of an actuation signal by dividing it into two ITS SRs.	SR 3.7.2.2	SR 4.7
A3.7-94	Rewords CTS statement that test shall be performed within 24 hours of entering power operation. POWER OPERATION in this context has been defined as MODE 1 in accordance ITS definitions.	SR 3.7.5.2 and 3.7.5.4 Note	SR 4.8.A.8 Note
A3.7-97	Rewords CTS specification with an explicit requirement to verify that each CC system pump starts. This is consistent with the acceptance criteria PI uses for this test.	SR 3.7.7.3	SR 4.5.A.4
A3.7-105	Restates CTS requirements to test the auxiliary building normal ventilation system isolation valves with the SR. This change does not result in any operational or technical changes to the CTS.	SR 3.7.12.4	SR 4.4.E
A3.7-113	Restates CTS Frequency from refueling outage to 24 months. The CTS defines the Frequency for refueling outage as not to exceed 24 months. Therefore, the CTS and ITS are consistent and no technical or operational changes are made.	SR 3.7.7.2, 3.7.7.3, and 3.7.8.5	SR 4.5.A.4.a, 4.5.A.5.a, 4.5.B.3.e, 4.5.A.B.3.f.

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.8-01	Did not include general CTS Applicability and Objective statements. ITS administratively incorporates these statements within each specification, the plant design features, or systems to which it applies. These statements have been administratively incorporated, into the ITS, describing plant design features or systems since they do not establish any regulatory or operational requirements.	LCO 3.8	LCO 3.7 and SR 4.6
A3.8-10	Did not include CTS requirements for all engineered safety features equipment associated with the OPERABLE DG to be OPERABLE. These requirements are "built in" the format of the ITS and LCO 3.0.6.	LCO 3.0.6 and LCO 3.8.1 Cond B and D	LCO 3.7.B.1 and 3.7.B.3
A3.8-13	Clarifies CTS requirements entering LCO 3.0.C due to the CTS into lack of have any specific Required Actions for the subject Condition. ITS does provide a specific Condition which is to enter LCO 3.0.3.	LCO 3.8.1 Condition G	LCO 3.0.C
A3.8-15	Reformats various CTS requirements by specifically identifying which Specification (s) apply for various plant conditions.	LCO 3.8.1, Condition D	VARIOUS
A3.8-17	Reformats CTS to ITS format and verbiage. In addition, ITS implements LCO 3.0.6 (SFDP) which is consistent with current operating practices of PI.	LCO 3.0.6, 3.8.1 Cond F, 3.8.4 Cond D, 3.8.7 Cond C, and 3.8.9 Cond A	LCO 3.7.B

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.8-20	Reformats and clarifies CTS requirements for two reactor protection instrument AC inverters inoperable.	LCO 3.8.7, Condition A and B	LCO 3.7.B.9
A3.8-22	Clarifies CTS by adding a specific Required Action to enter LCO 3.0.3 in the event that two trains with inoperable distribution subsystems result in a loss of safety function. This is consistent with the intent and practices of PI. Since the CTS does not have any specific Actions for this Condition, the plant would enter LCO 3.0.C.	LCO 3.0.3, and LCO 3.8.9, Condition E	LCO 3.0.C
A3.8-23	Clarifies CTS requirements for the service building electrical power subsystem components when being used for the safeguards DC electrical power subsystems during a plant outage. This is consistent with current plant procedures plant design, and past operating practices.	LCO 3.8.5	LCO 3.7.B
A3.8-25	Revises CTS fuel oil storage tank level to specify the total available fuel oil quantity. This change provides an accurate description of the PI design.	SR 3.8.3.1	SR 4.6.A.1.b
A3.8-30	Clarifies CTS statements by stating that only one DG be started at a time. This is current PI operating practices.	SR 3.8.1.3 Note 3	SR 4.6.A.1
A3.8-38	Did not include CTS non-pertinent information.	NA	SR 4.6.A.1.e, 4.6.A.2.c, and 4.6.A.3.b.2
A3.8-39	Clarifies CTS by specifically stating the requirements to verify fuel oil properties of new and stored fuel oil. This is consistent with current plant procedures and practices.	SR 3.8.3.2	SR 4.6.A.1.c
A3.8-40	Did not include non-pertinent CTS information by specifically stating that the fuel oil transfer pump is started and operating. If the pump is operating then it has been started.	NA	SR 4.6.A.1.d

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.8-51	Did not include non-pertinent CTS information.	NA	SR 4.6.A.1.e
A3.8-53	Clarifies CTS requirements by replacing the word tested with verify.	SR 3.8.4.1	SR 4.6.B.1
A3.8-56	Did not include CTS descriptive wording for MODES 1, 2, 3, and 4.	NA	LCO 3.7.A
A3.8-57	Clarifies CTS wording requiring determination that the OPERABLE DG is not inoperable due to common cause failure.	LCO 3.8.1 Condition B	LCO 3.7.B
A3.8-58	Revises CTS adding specific verbiage to more accurately reflect PI testing of the DGs.	SR 3.8.1.2	SR 4.6.A.1.e
A3.8-60	Reformatted CTS SR clarifying voltage and frequency testing requirements.	SR 3.8.1.6	SR 4.6.A.2.a
A3.8-62	Clarifies CTS requirements for the battery discharge test. For batteries during the first refueling and once every 5 years thereafter.	SR 3.8.6.6	SR 4.6.B.4
A3.8-63	Clarifies CTS that one 4 kV safeguards bus and/or its associated 480V bus including associated MCC may be inoperable or not fully energized for 8 hours provided the 4 kV safeguards bus and its associated 480V safeguards buses are verified to be OPERABLE and the DGs and safeguards equipment associated with the redundant train are OPERABLE.	LCO 3.8.9 Cond A	LCO 3.7.B.6
A3.8-68	Clarifies CTS intent by stating that if the DG fuel oil cannot be restored to within limits, declare the DGs inoperable and enter the applicable Conditions and Required Actions of LCO 3.7.8.	LCO 3.8.3, Condition D	NA

Table A – Administrative Changes
ITS Section 3.8 – Electrical Power Systems
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.8-70	Does not include a one time relief for performing modification 99EB01.	NA	LCO 3.7.B.6.a and b

Table A – Administrative Changes
ITS Section 3.9 – Refueling Operations
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.9-00	Editorial changes were made in reformatting, renumbering, and rewording in accordance with the guidance of NUREG-1431.	LCO 3.9	Table TS.1-1, 3.8, Table TS.4.1-2A, and Table TS.4.1-2B
A3.9-02	Did not include general CTS Applicability and Objective statements at the beginning of each CTS section. These statements only provide general information and do not impose any operational or technical requirements.	LCO 3.9	LCO 3.8
A3.9-03	Revises CTS format such that each specification in the Refueling Operations Section contains its own Applicability and the CTS specifications are marked up to correspond to these Applicabilities.	LCO 3.9	LCO 3.8.A.1
A3.9-05	Rewords CTS by adding the words "when connected " and "limits are met" clarifying the intent of the CTS.	LCO 3.9.1	Table 1-1
A3.9-06	Clarifies CTS that containment closure requires four bolts required to hold the equipment hatch in place when it is considered closed which is consistent with the CTS.	LCO 3.9.4	LCO 3.8.A.1.a.1
A3.9-07	Restates CTS requirements which allow for at least one isolation valve to be OPERABLE (that is by automatic closure) or locked.	LCO 3.9.4	LCO 3.8.A.1.a.1
A3.9-10	Rewords CTS requirements for isolation of lines which penetrate containment and provide a direct path from containment atmosphere to the outside atmosphere.	LCO 3.9.4	LCO 3.8.A.1.a.1
A3.9-12	Rewords CTS requirements making minor editorial changes.	LCO 3.9.4	LCO 3.8.A.1.a.2

Table A – Administrative Changes
ITS Section 3.9 – Refueling Operations
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A3.9-14	Did not include CTS clause, "following a fuel handling accident in containment" as the basis for requiring an OPERABLE air lock or operating containment fan coil. It is understood that the purpose of this Specification is to mitigate the consequences of a fuel handling accident in containment since that is the regulatory basis for a Refueling Operations LCO.	NA	LCO 3.8.A.1.a.2.b
A3.9-26	Restates CTS Applicability statements consistent with the ISTS.	LCO 3.9	LCO 3.8.A.1.d
A3.9-28	Restates CTS applicability of this specification to apply to movement of fuel assemblies "in containment".	LCO 3.9.2	LCO 3.8.A.1.e
A3.9-47	Clarifies CTS Action Statements to incorporate the Applicability changes for each individual specification were discussed previously.	LCO 3.9.2, Condition A, 3.9.3, 3.9.4, Condition A, 3.9.5, Condition A. and 3.9.6	LCO 3.8.A.2 and 3.8.A.3
A3.9-48	Restates CTS requirements allowing for not reducing boron concentration.	LCO 3.9.5 and 3.9.6	LCO 3.8.A.3
A3.9-50	Clarifies CTS requirements for equipment hatch and penetration closure.	LCO 3.9.5 and 3.9.6	LCO 3.8.A.3
A3.9-52	Clarifies CTS required actions for when the one RHR pump is not operating and the water level is below 20 ft above the reactor vessel flange.	LCO 3.9.2	LCO 3.8.A.2

Table A – Administrative Changes
ITS Section 4.0 – Design Features
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A4.0-00	Editorial changes were made in reformatting, renumbering, and rewording in accordance with the guidance of NURGE-1431.	4.3.1	5.1, 5.3, and 5.6
A4.0-02	Revises CTS description of the reactor core to conform to ISTS format.	4.2	5.3.A
A4.0-06	Revises CTS requirements to include a statement for the spacing of new fuel storage and change references to other sections of the CTS to agree with the ITS location of the information.	4.3.1	5.6.A
A4.0-07	Includes a new statement specifying that the spent fuel pool design prevents draining the pool which replaces CTS statements.	4.3.2	5.6.B
A4.0-09	Revises CTS description of fuel storage capacity.	4.3.3	5.6.D
A4.0-11	Includes reference to TN-40 earlier in the paragraph.	4.3.1	5.6.A.3

Table A – Administrative Changes
ITS Section 5.0 – Administrative Controls
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A5.0-00	Editorial changes were made in reformatting, renumbering, and rewording. These changes do not change or delete any technical requirements.	5.1	6.1
A5.0-04	Restates CTS requirements to the Steam Generator (SG) tube surveillance Program as an administrative control requirement.	5.0	4.12.A
A5.0-05	Restates CTS requirements for Steam Generator (SG) tube surveillance Program in the administrative controls.	5.0	4.12.E
A5.0-06	Revises section, paragraph, numbering, and punctuation.	5.0	6.0
A5.0-07	Rewords CTS requirements to be consistent with 10CRF50.59.	5.0	6.5.L.2.b
A5.0-11	Did not include CTS requirements for shift manning since they are included in 10 CFR50.54(m)(i)(iii) and 50.54(k).	NA	6.2.B
A5.0-12	Replaces CTS specific personnel job titles with general job titles.	5.0	6.2 and 6.5
A5.0-13	Revises CTS minor wording changes to make it consistent with ISTS as currently modified by travelers.	5.2.2.b	6.2 and 6.4
A5.0-14	Did not include CTS containment spray system (CS), by design, as one of the example systems in the primary coolant sources outside containment.	NA	6.5.B
A5.0-16	Clarifies to assure proper understanding when complying with 10 CFR 55.4 requirements.	5.3	6.3
A5.0-24	Revises requirements with respect to the applicability of CTS 4.0.A and 4.0.B to properly interface with the ITS SR 3.0.3 requirements and 10 CFR 50 Appendix J.	5.5.14	6.5.M

Table A – Administrative Changes
ITS Section 5.0 – Administrative Controls
(DOC No. are numbered sequentially by ITS Section)

DOC No.	Summary	ITS Section	CTS Section
A5.0-26	Clarifies reporting requirements stating that a single submittal may be made for the plant combining sections common to a two unit plant.	5.6.1	6.6.A, 6.6.B and 6.6.C
A5.0-27	Did not include CTS requirements for monthly reporting of challenges to the pressurizer power operated relief valves or pressurizer safety valves.	NA	6.6.D
A5.0-28	Includes COLR reference to latest Prairie Island Plant approved steam line break methodology.	5.5.5	6.5.E
A5.0-31	Replaces CTS list of limits and corresponding TS with a new list of ITS specifications which reference the COLR. Each of these ITS specifications either corresponds to a CTS which references the COLR or justification was previously provided in the appropriate ITS package for relocating the limit to the COLR.	5.6.5	6.6.E
A5.0-32	Replaces CTS list of TS referencing the PTLR with a new list of ITS specifications which reference the PTLR. Each of these ITS specifications either corresponds to a CTS which references the PTLR or justification was previously provided in the appropriate ITS package for relocating the limit to the PTLR.	5.6.6	6.6.F
A5.0-33	Revises CTS requirements for high radiation area updating the acceptable alternate controls to those given in 10 CFR 20.1601 which provide an equivalent level of radiation protection to that currently provided.	5.7	6.7
A5.0-34	Revises CTS Section titles to agree with the recommendations of Regulatory Guide 8.38 which will assure that adequate protection is provided without unnecessary radiation exposure.	5.7.1 and 5.7.2	6.7.A and 6.7.B
A5.0-36	Restates PI requirements for battery monitoring and maintenance.	5.5.15	6.5
A5.0-38	Restates CTS reporting requirement for EM as an administrative report.	5.0	5.6